

Hearing Date: To be Determined
Response Date: March 8, 2019

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No.
08-13555 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

1ST ADVANTAGE MORTGAGE, L.L.C. *et al.*,

Defendants.

Adversary Proceeding
No. 16-01019 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

1AM, L.L.C., f/k/a 1ST ADVANTAGE MORTGAGE,
L.L.C. *et al.*

Defendants.

Adversary Proceeding
No. 16-01377 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICAN BANK and CONGRESSIONAL
BANCSHARES, INC. (successor-in-interest),

Defendants.

Adversary Proceeding
No. 16-01003 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICAN HOME EQUITY CORPORATION,

Defendants.

Adversary Proceeding
No. 16-01300 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

-against-

AMERICAN LENDING NETWORK, INC.,

Defendant.

Adversary Proceeding
No. 16-01347 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICA'S MORTGAGE ALLIANCE, INC. and
AMERICA'S MORTGAGE, LLC,

Defendants.

Adversary Proceeding
No. 16-01378 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

APPROVED FUNDING CORP.,

Defendants.

Adversary Proceeding
No. 16-01284 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ARLINGTON CAPITAL MORTGAGE CORPORATION
and GATEWAY FUNDING DIVERSIFIED MORTGAGE
SERVICES, LP,

Defendants.

Adversary Proceeding
No. 16-01351 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ATLANTIC BAY MORTGAGE GROUP, L.L.C.,

Defendants.

Adversary Proceeding
No. 16-01311 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AURORA FINANCIAL, LLC f/k/a AURORA
MORTGAGE, LLC,

Defendants.

Adversary Proceeding
No. 16-01312 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

-against-

BANK OF ENGLAND,

Defendant.

Adversary Proceeding
No. 16-01285 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BONDCORP REALTY SERVICES INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BROADVIEW MORTGAGE CORPORATION ,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BWC MORTGAGE SERVICES, BWC REAL ESTATE
INC. and COMMERCE HOME MORTGAGE, INC. f/k/a
Simonich Corp.,

Defendants.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CAPITAL BANK CORPORATION, as successor by merger
to TIB Bank,

Defendant.

Adversary Proceeding
No. 16-01302 (SCC)

Adversary Proceeding
No. 16-01286 (SCC)

Adversary Proceeding
No. 16-01376 (SCC)

Adversary Proceeding
No. 16-01367 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CHERRY CREEK MORTGAGE CO., INC.,

Defendant.

Adversary Proceeding
No. 16-01287 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CIRCLE ONE MORTGAGE COMPANY and FIRST
NATIONAL BANK,

Defendants.

Adversary Proceeding
No. 16-01364 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CITY FIRST MORTGAGE SERVICES, LLC,

Defendants.

Adversary Proceeding
No. 16-01303 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CORNERSTONE MORTGAGE, INC.,

Defendant.

Adversary Proceeding
No. 16-01288 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CRESTLINE FUNDING CORPORATION,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DHI MORTGAGE COMPANY LTD.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DIRECTORS MORTGAGE, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DIVERSIFIED CAPITAL FUNDING, INC. and
AMERICAN PACIFIC MORTGAGE CORPORATION,
individually and as successor by merger to Diversified
Capital Funding, Inc.,

Defendants.

Adversary Proceeding
No. 16-01306 (SCC)

Adversary Proceeding
No. 16-01374 (SCC)

Adversary Proceeding
No. 16-01345 (SCC)

Adversary Proceeding
No. 16-01360 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

FAIRMONT FUNDING LTD.,

Defendants.

Adversary Proceeding
No. 16-01382 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

FIRST BANK,

Defendant.

Adversary Proceeding
No. 16-01289 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

FIRST CALIFORNIA MORTGAGE COMPANY,

Defendant.

Adversary Proceeding
No. 16-01313 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

FIRST CAPITAL GROUP, L.P. and FIRST CAPITAL
CORPORATION OF LOS ANGELES,

Defendant.

Adversary Proceeding
No. 16-01379 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01305 (SCC)

FIRST EQUITY MORTGAGE BANKERS, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01290 (SCC)

FIRST MORTGAGE CORPORATION,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01307 (SCC)

FIRST RESIDENTIAL MORTGAGE SERVICES
CORPORATION,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01363 (SCC)

GATEWAY BANK FSB,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01291 (SCC)

GATEWAY MORTGAGE GROUP, LLC,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01292 (SCC)

GUARANTEED RATE, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 17-01001 (SCC)

GUILD MORTGAGE COMPANY,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01317 (SCC)

HARTLAND MORTGAGE CENTERS, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME CAPITAL FUNDING, d/b/a SECURITY ONE
LENDING,

Defendant.

Adversary Proceeding
No. 16-01344 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME LOAN CENTER, INC.,

Defendant.

Adversary Proceeding
No. 16-01342 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME LOAN MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding
No. 16-01319 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

iFREEDOM DIRECT CORPORATION
F/K/A NEW FREEDOM MORTGAGE CORP.,

Defendant.

Adversary Proceeding
No. 15-01426 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

IMORTGAGE.COM, INC. and
LOANDEPOT.COM, LLC,

Defendants.

Adversary Proceeding
No. 16-01283 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

LAKELAND MORTGAGE CORPORATION,

Defendants.

Adversary Proceeding
No. 16-01320 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

LOAN CORRESPONDENTS, INC.,

Defendant.

Adversary Proceeding
No. 16-01337 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MARIBELLA MORTGAGE, LLC,

Defendant.

Adversary Proceeding
No. 16-01322 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MC ADVANTAGE, LLC f/k/a REPUBLIC MORTGAGE
HOME LOANS, LLC,

Defendant.

Adversary Proceeding
No. 16-01334 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MEGA CAPITAL FUNDING, INC.,

Defendant.

Adversary Proceeding
No. 16-01304 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MEGASTAR FINANCIAL CORP.,

Defendant.

Adversary Proceeding
No. 16-01301 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MORTGAGE CAPITAL ASSOCIATES, INC.,

Defendant.

Adversary Proceeding
No. 16-01318 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MOUNTAIN WEST FINANCIAL, INC.,

Defendant.

Adversary Proceeding
No. 16-01349 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NATIONAL FUNDING COMPANY, LLC,

Defendant.

Adversary Proceeding
No. 16-01327 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NEW FED MORTGAGE CORP.,

Defendant.

Adversary Proceeding
No. 16-01299 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NORTH ATLANTIC MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding
No. 16-01339 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

OAKTREE FUNDING CORP.,

Defendant.

Adversary Proceeding
No. 16-01298 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ORO REAL, INC.,

Defendant.

Adversary Proceeding
No. 16-01330 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PARAMOUNT RESIDENTIAL MORTGAGE GROUP,
INC.,

Defendant.

Adversary Proceeding
No. 16-01293 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PARKSIDE LENDING, LLC,

Defendant.

Adversary Proceeding
No. 16-01308 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PMAC LENDING SERVICES, INC., individually and as successor by merger to PMC Bancorp, f/k/a Professional Mortgage Corp., and as successor by merger to Reliant Mortgage Company, LLC, and PMC BANCORP, f/k/a Professional Mortgage Corp., individually, and RELIANT MORTGAGE COMPANY, LLC, individually,

Adversary Proceeding
No. 16-01353 (SCC)

Defendants.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

POPULAR MORTGAGE CORP.,

Defendants.

Adversary Proceeding
No. 16-01335 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

REPUBLIC STATE MORTGAGE CO., individually and as successor by merger to Union Trust Mortgage Corporation,

Defendant.

Adversary Proceeding
No. 16-01365 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

RESIDENTIAL HOME FUNDING CORP.,

Defendant.

Adversary Proceeding
No. 16-01361 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

RESPONSE MORTGAGE SERVICES, INC.,

Defendant.

Adversary Proceeding
No. 16-01343 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ROSS MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding
No. 16-01324 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SACRAMENTO 1ST MORTGAGE, INC. individually and
as successor by merger to COMSTOCK MORTGAGE,

Defendants.

Adversary Proceeding
No. 16-01350 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SANTANDER BANK, N.A., f/k/a Sovereign Bank, FSB,

Defendant.

Adversary Proceeding
No. 16-01357 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SECURITYNATIONAL MORTGAGE COMPANY,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SHEA MORTGAGE INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SIERRA PACIFIC MORTGAGE COMPANY, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SOUTHEAST FUNDING ALLIANCE, INC.,

Defendant.

Adversary Proceeding
No. 16-01325 (SCC)

Adversary Proceeding
No. 16-01294 (SCC)

Adversary Proceeding
No. 16-01341 (SCC)

Adversary Proceeding
No. 16-01314 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

STEARNS LENDING, LLC,

Defendant.

Adversary Proceeding
No. 16-01001 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

STERLING NATIONAL MORTGAGE COMPANY, INC.,

Defendant.

Adversary Proceeding
No. 16-01316 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUBURBAN MORTGAGE, INC.,

Defendant.

Adversary Proceeding
No. 16-01295 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUN AMERICAN MORTGAGE COMPANY,

Defendant.

Adversary Proceeding
No. 16-01296 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUNSET MORTGAGE COMPANY L.P. and
AVONWOOD CAPITAL CORPORATION,

Defendants.

Adversary Proceeding
No. 16-01358 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

THE LENDING COMPANY, INC.,

Defendant.

Adversary Proceeding
No. 16-01331 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

THE MORTGAGE STORE FINANCIAL, INC.,

Defendant.

Adversary Proceeding
No. 16-01354 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

WEI MORTGAGE LLC f/k/a WEI MORTGAGE
CORPORATION,

Defendant.

Adversary Proceeding
No. 16-01346 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01333 (SCC)

WINDSOR CAPITAL MORTGAGE CORPORATION,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01371 (SCC)

WINSTAR MORTGAGE PARTNERS, INC.,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01369 (SCC)

WINTRUST MORTGAGE CORPORATION,

Defendant.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

Adversary Proceeding
No. 16-01370 (SCC)

WJ CAPITAL CORPORATION, and SECURED CAPITAL
FUNDING CORP., as successor by merger to WJ Capital
Corporation,

Defendants.

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,
- against -

WR STARKEY MORTGAGE, LLP,

Defendant.

Adversary Proceeding
No. 16-01326 (SCC)

NOTICE OF MOTION OF MARITZA DOMINGUEZ BRASWELL
TO WITHDRAW AS COUNSEL OF RECORD FOR
LEHMAN BROTHERS HOLDINGS INC.

PLEASE TAKE NOTICE that a Motion has been made by Fox Rothschild LLP and Maritza Dominguez Braswell for Ms. Braswell to withdraw as counsel of record for Lehman Brothers Holdings Inc. (“LBHI”).

PLEASE TAKE FURTHER NOTICE that objections, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court, together with proof of service, electronically in accordance with General Order M-399 (available at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s electronic case filing system, and by all other parties in interest, on a 3.5 inch disk, compact disk, or flash drive, preferably in PDF format, WordPerfect or any other Windows-based word processing format (with two hard copies directly to Chambers), and shall be served upon (i) the Chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 623, (ii) Wollmuth Maher & Deutsch LLP, 500 Fifth Ave., New York, New York 10110 (Attn: William A. Maher, Esq. and Adam M. Bialek, Esq.), attorneys for LBHI, and (iii) Fox Rothschild LLP, 101

Park Avenue, Ste. 1700, New York, New York 10178 (Attn: Michael A. Rollin, Esq.) attorneys for LBHI, on or before **March 8, 2019 at 4:00 PM (ET) (the “Response Deadline”)**.

Any objections to the Motion will be addressed at a hearing on a date to be determined, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, Courtroom 623, New York, New York 10004.

ARGUMENT

1. Pursuant to Local Rule 2090-1(e), an attorney who has appeared as attorney of record may withdraw or be replaced only by order of the Court for cause shown.

2. Ms. Braswell has been appointed Colorado Deputy Attorney General for Civil Litigation and Employment Law, and as such, will not be working at Fox Rothschild LLP for the duration of her appointment as Deputy Attorney General.

3. LBHI will not be prejudiced by the withdrawal of Ms. Braswell as counsel and Michael Rollin and Caleb Durling of Fox Rothschild LLP will continue to represent LBHI.

DATED: February 26, 2019

Respectfully submitted,

By: Michael A. Rollin
Michael A. Rollin
Caleb Durling
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- and -

William A. Maher
Paul R. DeFilippo
James N. Lawlor
Adam M. Bialek
Mara R. Lieber
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*Counsel for Plaintiff Lehman Brothers
Holdings Inc.*